

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 06-6

Respondent: John Conroy

Title: Vice President – Regulatory MA

REQUEST: Department of Telecommunications and Energy, Set #2

DATED: May 24, 2006

ITEM: DTE 2-1 In response to DTE-1-1 and DTE-1-3, Verizon stated it was unable to provide data related to the nature of trouble reports and the time to clear trouble reports for the Town of Middlefield (“Town” or “Middlefield”) for the past two years because it “would require a time-consuming, dedicated manual work effort to determine whether any such detail exists.” Please provide complete and detailed documentation regarding the manner in which Verizon tracks trouble reports, including a description of the software used by Verizon, the data that is input into the computer program, the manner in which such data is input into the computer, the reports that Verizon automatically generates on a regular basis, and the uses of those reports.

REPLY: Verizon currently tracks network performance metrics in Massachusetts using the Network Analysis and Measurement System (NAMS) database. The NAMS database is the source for the Network Maintenance Service Items reported by Verizon to the Department in the monthly Service Quality Index. Reports on the percent of troubles cleared in 24 hours for Massachusetts residence and business customers, as well as the reports per 100 lines, are automatically generated monthly at the Wire Center/Central Office level, not by individual telephone number. The Town of Middlefield is not an individual Wire Center/Central Office, but rather is part of the Becket Wire Center/Central Office. In response to DTE 1-1 Verizon MA provided a list of the network trouble reports per 100 lines for customers in the Town of Middlefield because information on the number of reports per 100 lines can be extracted with a moderate level of manual data manipulation. Verizon MA was not able to provide “a description of the nature of trouble reports”, “a percentage of trouble reports cleared within 24 hours for both residential and commercial customers”, and for those trouble reports, “the average cleared time for each year for the two-year period”, and a comparison of Middlefield’s

**REPLY to
DTE 2-1
(continued):**

percentage of time to clear trouble reports to the statewide averages for the same two-year period”.

Massachusetts customer troubles are logged into a Verizon system called Vrepair. The customer’s telephone number is the key to all address and trouble history. When a customer reports a trouble to Vrepair, the customer is given the option of inputting the trouble through the Voice Portal system by answering a series of voice prompts or speaking to a live Verizon Customer Service Attendant. In both cases, the customer line is tested using the Mechanized Loop Testing (MLT) system. If a trouble is indicated, then it is routed to the appropriate organization. Vrepair can be queried about any customer’s telephone number to determine whether any troubles were reported on that number. In order to determine the nature of and time to clear individual trouble reports in the town of Middlefield, Verizon would need to query the Vrepair system for each trouble report on a per telephone number basis. Therefore, in order to generate the information originally requested for Middlefield, a time consuming manual effort is required to query and then analyze each telephone number.

VZ #15

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REQUEST: Department of Telecommunications and Energy, Set #2

DATED: May 24, 2006

ITEM: DTE 2-2 In response to DTE-1-2, the Company provides a percentage of reports per 100 lines for the Town. Please state the number of lines in Middlefield.

REPLY: There were 588 Verizon lines in service on April 30, 2006.

VZ #16

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DATED: May 24, 2006

ITEM: DTE 2-3 In response to DTE-1-2, Verizon provided information through February 2006. Please provide monthly reports for the Town for March 2006, April 2006, and May 2006 (when available).

REPLY: March 2006: 1.70 reports per 100 lines.
April 2006: 2.89 reports per 100 lines.
May 2006 data is unavailable at this time.

VZ #17

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 06-6

Respondent: John Conroy

Title: Vice President – Regulatory MA

REQUEST: Department of Telecommunications and Energy, Set #2

DATED: May 24, 2006

ITEM: DTE 2-4 In response to DTE-1-4, Verizon stated that the Company “captures all trouble reports received by its repair personnel in the Verizon repair call center.” Please clarify whether the repair personnel in the Verizon repair call center receive trouble reports sent through a Berkshire County dispatcher via radio.

REPLY: Verizon does not have the technical capability to receive trouble reports via radio, including but not limited to the Berkshire County dispatcher radio system.

VZ #18

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 06-6

Respondent: John Conroy

Title: Vice President – Regulatory-MA

REQUEST: Department of Telecommunications and Energy, Set #2

DATED: May 24, 2006

ITEM: DTE 2-5 In response to DTE-1-11(a), the Company stated that WMEC is responsible for maintenance and replacement of jointly owned poles in the Town. At the public hearing, there was testimony that a Verizon employee condemned a pole in Middlefield (see Tr. at 17). Please state whether Verizon employees are authorized to condemn poles that are not solely-owned by Verizon and for which other companies bear responsibility for maintenance and replacement, and state the applicable guidelines used by Verizon employees.

REPLY: Verizon places a strong emphasis on employee safety. Before any Verizon employee performs work aloft at a pole location, the pole is visually inspected to determine if it is a safe work environment regardless of whose pole maintenance area is involved. A visual pole inspection includes examining the surface of the pole from top to ground line for visible defects and external evidence of internal defects. The Verizon technician is looking for any unusual cracking, shrinkage, or discoloration at the top and side surfaces of the pole that may indicate the pole is unsafe to work on. The determination of the safety of the pole is left to the discretion of the Verizon technician who will be working aloft at the pole location.

Verizon's records do not indicate that a Verizon employee "condemned" a pole in Middlefield, but did note and report a safety concern. In locations that are not Verizon maintenance areas, a pole that is found to be unsafe would be referred to the pole custodian for further evaluation and corrective action if necessary.

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DATED: May 24, 2006

ITEM: DTE 2-6 In response to DTE-1-11(b), the Company stated it “considers customer records proprietary and will disclose that data to the Department only upon express consent of the customer.” Please provide the requested customer records to the Department and accompany the information with a motion for confidential treatment.

REPLY: As indicated in Verizon MA’s Reply to DTE 1-11(b), telecommunications carriers are required to obtain “approval of the customer before using, disclosing or permitting access to “individually identifiable” customer proprietary network information, except as otherwise required by law (47 U.S.C. § 222). Since filing its original response, Verizon has been informed by the Department that it has received actual oral authorization from the customer allowing Verizon to disclose that information. Therefore, the requested customer information is attached.

VZ #20

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Respondent: John Conroy

Title: Vie President – Regulatory MA

REQUEST: Department of Telecommunications and Energy, Set #2

DATED: May 24, 2006

ITEM: DTE 2-7 In response to DTE-1-13, the Company provided a Double Pole Report showing that only one double pole existed in the Town as of April 30, 2006. With respect to this information, please address the following questions:

- (a) Please provide the location of this double pole, state whether Verizon has any pole attachments on the pole that is scheduled for removal, and state the date on which Verizon became aware of this double pole.
- (b) Because Verizon's response that there is only one double pole conflicts with testimony provided at the public hearing that there are numerous double poles throughout the Town (see, e.g., Tr. at 43-44), please provide the documentation upon which Verizon's response that there is only one double pole in Middlefield is based.

REPLY: The double pole is located on Main Road in Middlefield. Verizon transferred its attachments on May 31, 2006. The pole is now ready for removal by Western Massachusetts Electric Company. Verizon first became aware of the double pole when it was erected in August 2005.

The Backlog Double Pole Progress Report, which was previously filed with the Department on May 5, 2006, in Docket DTE 03-87, provides the documentation upon which Verizon's response is based. The specific information requested by the Department can be found in the "New Pole Detail" Tab (Line 7528) of that report.